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April 8, 2022

Honorable Elizabeth S. Stong
United States Bankruptcy Judge
Eastern District of New York
Conrad B. Duberstein Courthouse
271-C Cadman Plaza East
Brooklyn, NY 11201-1800

Re: Sandra Y. Stanton
Bankruptcy Case No: 19-46013-ess

This office represents the Secured Creditor, SN Servicing Corporation, as servicer for U.S. Bank Trust National Association, as Trustee of the Bungalow Series IV Trust ("SN") in the above-referenced action. Pursuant to the Court's Loss Mitigation Order entered on January 13, 2020, please let this letter serve as a status report and summary of what has transpired between the parties.

The instant loss mitigation has a lengthy history. In June 2021, SN retained our firm as new counsel in this bankruptcy matter. On June 15, 2021, our firm filed and served the Creditor Loss Mitigation Affidavit with our contact information and a blank copy of SN's financial package. After some correspondence with the Debtor's Attorney, the parties agreed that a re-review was warranted.

On August 17, 2021, the Debtor's Attorney sent our firm the Debtor's initial financial package for the re-review.

In the intervening months, the document exchange has been ongoing. On September 10, 2021, SN filed a status letter confirming that the Debtor must obtain her own insurance, rather than force-placed, and provide either an insurance quote or a copy of the policy. In the intervening months, the Debtor requested that SN generate a loan modification with the force-placed insurance as the escrow figure instead, which SN cannot do. The parties also routinely provided missing documents letters (on SN's part) or partially responsive documents (on the Debtor's part). To date, SN has not yet received a complete financial package for the re-review.

At the loss mitigation status conference held on January 25, 2022, in an effort to bring the instant loss mitigation to a conclusion, this Court directed the Debtor to provide a completely updated financial package by February 8, 2022. This Court also directed the parties to meet and confer on any remaining missing documents.

The Debtor then timely submitted an updated financial package on February 8, 2022, which our firm forwarded to SN. SN then reviewed all documents submitted to date and generated a missing documents letter dated February 18, 2022.



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As part of the conference between the parties, and in an effort to expedite the ongoing document exchange, undersigned counsel personally reviewed the current financial package and the missing documents request. As of March 2, 2022, the following documents are still required:

Missing documents as of March 2, 2022:

- Completed “Financial Analysis Worksheet.”
- Copies of the last 2 months pay stubs for all borrowers.
- Current copy of the Debtor’s social security award letter.
- Copy of current homeowner’s insurance policy or an estimate for coverage if the Debtor does not currently have homeowner’s insurance. Please make sure that the insurance coverage or quote includes the following Mortgagee Clause:

SN Servicing Corp.
ISAOA ATIMA
P.O. Box 35
Eureka, CA 95502
Loan #308739

Our firm emailed the above list of missing documents, the February 18, 2022 missing documents letter, and a detailed explanation of the additional information needed on the Financial Analysis Worksheet to the Debtor’s Attorney on March 2, 2022. The attorneys then had a productive telephonic conference on March 7, 2022.

Please also allow this status letter to confirm that the Debtor cannot use force-placed insurance as part of the loan modification review.

Currently, SN is awaiting the missing documents indicated herein to continue review. The parties have obtained a short adjournment, on consent, to allow the Debtor time to gather the current list of missing documents. Our firm will file the adjournment letter under separate cover.

Please feel free to contact our office should you have additional questions.

Sincerely,

Dated: April 8, 2022

/s/ Katherine Heidbrink
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